

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 2005-202

TEREZA PARTOW  
22360 Cass Avenue  
Woodland Hills, CA 91364

Registered Nurse License No. 539249

Respondent.

**DECISION**

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on June 11, 2008.

IT IS SO ORDERED this June 11, 2008.



President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 EDMUND G. BROWN JR., Attorney General  
of the State of California  
2 GLORIA A. BARRIOS  
Supervising Deputy Attorney General  
3 SCOTT J. HARRIS, State Bar No. 238437  
Deputy Attorney General  
4 300 So. Spring Street, Suite 1702  
Los Angeles, CA 90013  
5 Telephone: (213) 897-2554  
Facsimile: (213) 897-2804

6 Attorneys for Complainant

7  
8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Third Amended Accusation  
Against:

11 TEREZA PARTOW  
12 22360 Cass Avenue  
Woodland Hills, CA 91364  
13 Registered Nurse License No. 539249

14 Respondent.

Case No. 2005-202

OAH No. L-2007120060

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

15  
16 In the interest of a prompt and speedy resolution of this matter, consistent with the  
17 public interest and the responsibility of the Board of Registered Nursing, Department of  
18 Consumer Affairs, the parties hereby agree to the following Stipulated Surrender of License and  
19 Order which will be submitted to the Board for approval and adoption as the final disposition of  
20 the Accusation.

21 PARTIES

22 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of  
23 the Board of Registered Nursing (Board). She brought this action solely in her official capacity  
24 and is represented in this matter by Edmund G. Brown Jr., Attorney General of the State of  
25 California, by Scott J. Harris, Deputy Attorney General.

26 2. Tereza Partow (Respondent) is represented in this proceeding by attorney  
27 Melanie Partow, whose address is 723 Ocean Front Walk, Venice, California, 90291.

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3. On or about December 12, 1997, the Board of Registered Nursing issued Registered Nurse License No. 539249 to Respondent. The Registered Nurse License was in full force and effect at all times relevant to the charges brought in Third Amended Accusation No. 2005-202 and will expire on August 31, 2009, unless renewed.

## JURISDICTION

4. Third Amended Accusation No. 2005-202 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on March 13, 2008. Respondent timely filed her Notice of Defense contesting the Third Amended Accusation. A copy of Third Amended Accusation No. 2005-202 is attached as Exhibit A and incorporated herein by reference.

## ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Third Amended Accusation No. 2005-202. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Third Amended Accusation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

## CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Third Amended Accusation No. 2005-202, agrees that cause exists for discipline, and hereby surrenders her Registered Nurse License No. 539249 for the Board's formal acceptance.

1                   9.       Respondent understands that by signing this stipulation she enables the  
2 Board to issue an order accepting the surrender of her Registered Nurse License without further  
3 process.

4   RESERVATION

5                   10.       The admissions made by Respondent herein are only for the purposes of  
6 this proceeding, or any other proceedings in which the Board of Registered Nursing, Department  
7 of Consumer Affairs or other professional licensing agency is involved, and shall not be  
8 admissible in any other criminal or civil proceeding.

9   CONTINGENCY

10                  11.       This stipulation shall be subject to approval by the Board of Registered  
11 Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the  
12 Board of Registered Nursing may communicate directly with the Board regarding this stipulation  
13 and surrender, without notice to or participation by Respondent or her counsel. By signing the  
14 stipulation, Respondent understands and agrees that she may not withdraw this agreement or seek  
15 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails  
16 to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary  
17 Order shall be of no force or effect, and, except for this paragraph, it shall be inadmissible in any  
18 legal action between the parties, and the Board shall not be disqualified from further action by  
19 having considered this matter.

20                  12.       The parties understand and agree that facsimile copies of this Stipulated  
21 Surrender of License and Order, including facsimile signatures thereto, shall have the same force .  
22 and effect as the originals.

23                  13.       In consideration of the foregoing admissions and stipulations, the parties  
24 agree that the Board may, without further notice or formal proceeding, issue and enter the  
25 following Order:

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**ORDER**

IT IS HEREBY ORDERED that Registered Nurse License No. 539249, issued to Respondent Tereza Partow is surrendered and accepted by the Board of Registered Nursing.

14. The surrender of Respondent's Registered Nurse License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.

15. Respondent shall lose all rights and privileges as a Registered Nurse in California as of the effective date of the Board's Decision and Order.

16. Respondent shall cause to be delivered to the Board both her wall and pocket license certificate on or before the effective date of the Decision and Order.

17. Respondent fully understands and agrees that if she ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Third Amended Accusation No. 2005-202 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

18. Upon reinstatement of the license, Respondent shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the amount of five-thousand, seven-hundred and sixty-six dollars and zero cents (\$5,766.00). Respondent shall be permitted to pay these costs in a payment plan approved by the Board.

19. Should Respondent ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Third Amended Accusation No. 2005-202 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

1                   20.     Respondent shall not apply for licensure or petition for reinstatement for  
2 two (2) years from the effective date of the Board of Registered Nursing's Decision and Order.

3                                   ACCEPTANCE

4                   I have carefully read the above Stipulated Surrender of License and Order and  
5 have fully discussed it with my attorney, Melanie Partow. I understand the stipulation and the  
6 effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of  
7 License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
8 Decision and Order of the Board of Registered Nursing, Department of Consumer Affairs.

9 DATED: April/02/2008.

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12                                   \_\_\_\_\_  
13                                   TEREZA PARTOW  
14                                   Respondent

15                   I have read and fully discussed with Respondent Tereza Partow the terms and  
16 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
17 approve its form and content.

18 DATED: \_\_\_\_\_.

19  
20                                   \_\_\_\_\_  
21                                   MELANIE PARTOW  
22                                   Attorney for Respondent

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1                   20.     Respondent shall not apply for licensure or petition for reinstatement for  
2 two (2) years from the effective date of the Board of Registered Nursing's Decision and Order.

3                                   ACCEPTANCE

4                   I have carefully read the above Stipulated Surrender of License and Order and  
5 have fully discussed it with my attorney, Melanie Partow. I understand the stipulation and the  
6 effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of  
7 License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
8 Decision and Order of the Board of Registered Nursing, Department of Consumer Affairs.

9 DATED: \_\_\_\_\_

10  
11                                   \_\_\_\_\_  
12                                   TEREZA PARTOW  
13                                   Respondent

14                   I have read and fully discussed with Respondent Tereza Partow the terms and  
15 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
16 approve its form and content.

17  
18 DATED: 4/8/08 \_\_\_\_\_

19                                   \_\_\_\_\_  
20                                   Melanie J Partow  
21                                   MELANIE PARTOW  
22                                   Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing, Department of Consumer Affairs.

DATED: 4/10/08

EDMUND G. BROWN JR., Attorney General  
of the State of California

GLORIA A. BARRIOS  
Supervising Deputy Attorney General

  
SCOTT J. HARRIS  
Deputy Attorney General

Attorneys for Complainant

DOJ Matter ID: LA2004602236  
60284145.wpd



**Exhibit A**

**Third Amended Accusation No. 2005-202**

1 EDMUND G. BROWN JR., Attorney General  
of the State of California  
2 GLORIA A BARRIOS  
Supervising Deputy Attorney General  
3 SCOTT J. HARRIS, State Bar No. 238437  
Deputy Attorney General  
4 California Department of Justice  
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5 Los Angeles, CA 90013  
Telephone: (213) 897-2540  
6 Facsimile: (213) 897-2804

7 Attorneys for Complainant

8  
9 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Third Amended Accusation  
Against:

Case No. 2005-202

13 TEREZA PARTOW  
14 22360 Cass Avenue  
Woodland Hills, CA 91364

**THIRD AMENDED ACCUSATION**

15 Registered Nurse License No. 539249

16 Respondent.  
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18  
19 Complainant alleges:

20 **PARTIES**

21 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) brings this Third Amended  
22 Accusation solely in her official capacity as the Executive Officer of the Board of Registered  
23 Nursing, Department of Consumer Affairs (Board). This Third Amended Accusation supersedes  
24 and replaces nunc pro tunc the Accusations previously filed.

25 2. On or about December 12, 1997, the Board issued Registered Nurse  
26 License No. 539249 to Tereza Partow (Respondent). The Registered Nurse License was in full  
27 force and effect at all times relevant to the charges brought herein and will expire on August 31,  
28 2009, unless renewed.

## JURISDICTION

3. This Third Amended Accusation is brought before the Board, under the authority of the following laws. All Section references are to the Business and Professions Code unless otherwise indicated.

4. Section 2750 provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.

6. Section 118, subdivision (b), provides that the suspension, expiration, surrender, and/or, cancellation of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

7. Section 2761 states, in pertinent part:

“The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

“(a) Unprofessional conduct, which includes, but is not limited to, the following:

“(1) Incompetence, or gross negligence in carrying out usual certified or licensed nursing functions. . . .”

....

“(f) Conviction of a felony or of any offense substantially related to the qualifications, functions, and duties of a registered nurse, in which event the record of the conviction shall be conclusive evidence thereof.”

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1           8.       Section 2762 states, in pertinent part:

2           “In addition to other acts constituting unprofessional conduct within the meaning  
3 of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed  
4 under this chapter to do any of the following:

5           “(a) Obtain or possess in violation of law, or prescribe, or except as directed by a  
6 licensed physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish  
7 or administer to another, any controlled substance as defined in Division 10 (commencing with  
8 Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as  
9 defined in Section 4022.

10           . . . .

11           “(b) Use of any controlled substances as defined in Division 10 (commencing  
12 with Section 11000) of the Health and Safety Code, or any dangerous drug or dangerous device  
13 as defined in Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or  
14 injurious to himself or herself, any other person, or the public or to the extent that such use  
15 impairs his or her ability to conduct with safety to the public authorized by his or her license.”

16           . . . .

17           “(e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible  
18 entries in any hospital, patient, or other record pertaining to the substances described in  
19 subdivision (a) of this section.”

20           9.       Section 490 of the Code states:

21           “A board may suspend or revoke a license on the ground that the licensee has  
22 been convicted of a crime, if the crime is substantially related to the qualifications, functions, or  
23 duties of the business or profession for which the license was issued. A conviction within the  
24 meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo  
25 contendere. Any action which a board is permitted to take following the establishment of a  
26 conviction may be taken when the time for appeal has elapsed, or the judgment of conviction has  
27 been affirmed on appeal, or when an order granting probation is made suspending the imposition

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1 of sentence, irrespective of a subsequent order under the provision under the provisions of  
2 Section 1203.4 of the Penal Code.”

3 10. Health and Safety Code section 11173 states, in pertinent part:

4 “(a) No person shall obtain or attempt to obtain controlled substances, or procure  
5 or attempt to procure the administration of or prescription for controlled substances, (1) by fraud,  
6 deceit, misrepresentation, or subterfuge; or (2) by the concealment of a material fact.

7 “(b) No person shall make a false statement in any prescription, order, report, or  
8 record, required by this division. . . .”

9 11. Health and Safety Code section 11350, subdivision (a), states:

10 “Except as otherwise provided in this division, every person who possesses (1)  
11 any controlled substance specified in subdivision (b) or (c), or paragraph (1) of subdivision (f) of  
12 Section 11054, specified in paragraph (14), (15), or (20) of subdivision (d) of Section 11054, or  
13 specified in subdivision (b) or (c) of Section 11055, or specified in subdivision (h) of Section  
14 11056, or (2) any controlled substance classified in Schedule III, IV, or V which is a narcotic  
15 drug, unless upon the written prescription of a physician, dentist, podiatrist, or veterinarian  
16 licensed to practice in this state, shall be punished by imprisonment in the state prison.”

17 12. Health and Safety Code section 11550, subdivision (a), states, in pertinent  
18 part:

19 “No person shall use, or be under the influence of any controlled substance which  
20 is (1) specified in subdivision (b), (c), or (e), or paragraph (1) of subdivision (f) of Section 11054,  
21 specified in paragraph (14), (15), (21), (22), or (23) of subdivision (d) of Section 11054,  
22 specified in subdivision (b) or (c) of Section 11055, or specified in paragraph (1) or (2) of  
23 subdivision (d) or in paragraph (3) of subdivision (e) of Section 11055, or (2) a narcotic drug  
24 classified in Schedule III, IV, or V, except when administered by or under the direction of a  
25 person licensed by the state to dispense, prescribe, or administer controlled substances. . . .”

26 13. California Code of Regulations, title 16, section 1442, states:

27 “As used in Section 2761 of the code, 'gross negligence' includes an extreme  
28 departure from the standard of care which, under similar circumstances, would have ordinarily

1 been exercised by a competent registered nurse. Such an extreme departure means the repeated  
2 failure to provide nursing care as required or failure to provide care or to exercise ordinary  
3 precaution in a single situation which the nurse knew, or should have known, could have  
4 jeopardized the client's health or life."

5 14. California Code of Regulations, title 16, section 1443, states:

6 "As used in Section 2761 of the code, 'incompetence' means the lack of possession  
7 of or the failure to exercise that degree of learning, skill, care and experience ordinarily possessed  
8 and exercised by a competent registered nurse as described in Section 1443.5."

9 15. California Code of Regulations, title 16, section 1443.5 states, in pertinent  
10 part:

11 "A registered nurse shall be considered to be competent when he/she consistently  
12 demonstrates the ability to transfer scientific knowledge from social, biological and physical  
13 sciences in applying the nursing process, as follows:

14 . . . .

15 "(4) Delegates tasks to subordinates based on the legal scopes of practice of the  
16 subordinates and on the preparation and capability needed in the tasks to be delegated, and  
17 effectively supervises nursing care being given by subordinates. . . ."

18 16. California Code of Regulations, title 16, section 1444 states, in pertinent  
19 part:

20 "A conviction shall be considered to be substantially related to the qualifications,  
21 functions or duties of a registered nurse if to a substantial degree it evidences the present or  
22 potential fitness of a registered nurse to practice in a manner consistent with the public health,  
23 safety or welfare."

24 17. Section 125.3 provides, in pertinent part, that the Board may request the  
25 administrative law judge to direct a licentiate found to have committed a violation or violations  
26 of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
27 enforcement of the case.

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1 **CONTROLLED SUBSTANCES**

2 18. Demerol, a brand of meperidine hydrochloride, a derivative of the narcotic  
3 substance pethidine, is a Schedule II controlled substance as designated by Health and Safety  
4 Code section 11055(c)(17) and is categorized as a dangerous drug pursuant to Business and  
5 Professions Code section 4022.

6 **FIRST CAUSE FOR DISCIPLINE**

7 (Conviction of a Substantially Related Crime)

8 19. Respondent is subject to disciplinary action under Section 2761,  
9 subdivision (a), in conjunction with Section 2761, subdivision (f) and section 490 as defined in  
10 California Code of Regulations, title 16, section 1444, on the grounds of unprofessional conduct,  
11 in that Respondent was convicted of a substantially related crime as follows:

12 a. On or about September 12, 2007, Respondent was convicted of one count  
13 of violating Penal Code section 487, subdivision (a) (grand theft of property over \$400), a  
14 misdemeanor, in the Superior Court of the State of California, County of Los Angeles, Van Nuys  
15 Courthouse, Case No. LA054123, entitled *The People of the State of California v. Tereza*  
16 *Partow*. The underlying circumstances resulted from Respondent's diversion and taking of  
17 controlled substances, specifically Demerol, from her place of employment, Northridge Hospital  
18 Medical Center, Northridge, California, in or between February and March 2005, as more fully  
19 discussed in paragraphs 25 and 26, below.

20 **SECOND CAUSE FOR DISCIPLINE**

21 (Obtain or Possess a Controlled Substance)

22 20. Respondent is subject to disciplinary action under Section 2761,  
23 subdivision (a), in conjunction with Section 2762, subdivision (a), on the grounds of  
24 unprofessional conduct, in that on or about February 4, 2003, Respondent, while working as a  
25 registered nurse at St. John's Health Center, Santa Monica, California, admitted to the obtaining  
26 and possessing of Demerol without a prescription, in violation of Health and Safety Code  
27 sections 11173, subdivision (a), and 11350, subdivision (a).

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1 **FIFTH CAUSE FOR DISCIPLINE**

2 (Incompetence)

3 24. Respondent is subject to disciplinary action under Section 2761,  
4 subdivision (a), as defined in California Code of Regulations, title 16, section 1443 and 1443.5,  
5 subdivision (a)(4), on the grounds of unprofessional conduct, in that on or about February 4,  
6 2003, Respondent, by her own admission, failed to provide appropriate supervision to  
7 subordinate nursing staff when she tried to conceal her diversion of Demerol by advising them  
8 not to report the compromised Demerol stores.

9 **SIXTH CAUSE FOR DISCIPLINE**

10 (Obtaining Controlled Substances by Fraud, Deceit or Misrepresentation)

11 25. Respondent is subject to disciplinary action under Section 2761,  
12 subdivision (a), as defined in Section 2762, subdivision (a), for violating Health and Safety Code  
13 sections 11173, subdivision (a), and 11350, subdivision (a), on the grounds of unprofessional  
14 conduct, in that on or about four (4) days in February 2005, and four (4) days in March 2005,  
15 while on duty as a registered nurse at Northridge Hospital Medical Center, Northridge,  
16 California, Respondent obtained 4,200 mg Demerol, a controlled substance, by fraud, deceit,  
17 misrepresentation or subterfuge, as follows:

18 a. **Patient #87465746.** On or about March 5, 2005, at 1616 hours,  
19 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
20 failed to record administration of the withdrawn medication to the patient on any hospital  
21 records. Respondent failed to account for 100mg Demerol in any hospital records.

22 b. **Patient #87448080.** On or about February 19, 2005, at 1738 hours,  
23 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
24 failed to record administration of the withdrawn medication to the patient on any hospital  
25 records. Respondent failed to account for 100mg Demerol in any hospital records.

26 c. **Patient #21130802.** On or about February 15, 2005, at 0904 hours,  
27 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent

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1 failed to record administration of the withdrawn medication to the patient on any hospital  
2 records. Respondent failed to account for 100mg Demerol in any hospital records.

3 d. **Patient #21134960.** On or about February 24, 2005, at 1055 hours,  
4 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
5 failed to record administration of the withdrawn medication to the patient on any hospital  
6 records. Respondent failed to account for 100mg Demerol in any hospital records.

7 e. **Patient #21135892.** On or about February 24, 2005, at 1505 hours,  
8 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
9 failed to record administration of the withdrawn medication to the patient on any hospital  
10 records. Respondent failed to account for 100mg Demerol in any hospital records.

11 f. **Patient #8749873.**

12 (1) On or about February 19, 2005, at 0723 hours, Respondent signed out  
13 100mg Demerol without a physician order for this patient. Respondent failed to record  
14 administration of the withdrawn medication to the patient on any hospital records. Respondent  
15 failed to account for 100mg Demerol in any hospital records.

16 (2) On or about February 19, 2005, at 1318 hours, Respondent signed out  
17 100mg Demerol without a physician order for this patient. Respondent failed to record  
18 administration of the withdrawn medication to the patient on any hospital records. Respondent  
19 failed to account for 100mg Demerol in any hospital records.

20 (3) On or about February 19, 2005, at 1358 hours, Respondent signed out  
21 100mg Demerol without a physician order for this patient. Respondent failed to record  
22 administration of the withdrawn medication to the patient on any hospital records. Respondent  
23 failed to account for 100mg Demerol in any hospital records.

24 g. **Patient #21134762.**

25 (1) On or about March 6, 2005, at 0838 hours, Respondent signed out 100mg  
26 Demerol without a physician order for this patient. Respondent failed to record administration of  
27 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
28 for 100mg Demerol in any hospital records.

1 (2) On or about March 6, 2005, at 1242 hours, Respondent signed out 100mg  
2 Demerol without a physician order for this patient. Respondent failed to record administration of  
3 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
4 for 100mg Demerol in any hospital records.

5 h. **Patient #87433983.** On or about February 15, 2005, at 1030 hours,  
6 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
7 failed to record administration of the withdrawn medication to the patient on any hospital  
8 records. Respondent failed to account for 100mg Demerol in any hospital records.

9 i. **Patient #87446662.** On or about February 24, 2005, at 0733 hours,  
10 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
11 failed to record administration of the withdrawn medication to the patient on any hospital  
12 records. Respondent failed to account for 100mg Demerol in any hospital records.

13 j. **Patient #87426714.** On or about February 12, 2005, at 1051 hours,  
14 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
15 failed to record administration of the withdrawn medication to the patient on any hospital  
16 records. Respondent failed to account for 100mg Demerol in any hospital records.

17 k. **Patient #87449021.** On or about March 5, 2005, at 0918 hours,  
18 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
19 failed to record administration of the withdrawn medication to the patient on any hospital  
20 records. Respondent failed to account for 100mg Demerol in any hospital records.

21 l. **Patient #87464053.**

22 (1) On or about March 6, 2005, at 1403 hours, Respondent signed out 100mg  
23 Demerol without a physician order for this patient. Respondent failed to record administration of  
24 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
25 for 100mg Demerol in any hospital records.

26 (2) On or about March 6, 2005, at 1911 hours, Respondent signed out 100mg  
27 Demerol without a physician order for this patient. Respondent failed to record administration of  
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1 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
2 for 100mg Demerol in any hospital records.

3 m. **Patient #87475166.** On or about March 10, 2005, at 1800 hours,  
4 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
5 failed to record administration of the withdrawn medication to the patient on any hospital  
6 records. Respondent failed to account for 100mg Demerol in any hospital records.

7 n. **Patient #21127618.**

8 (1) On or about February 14, 2005, at 0735 hours, Respondent signed out  
9 100mg Demerol without a physician order for this patient. Respondent failed to record  
10 administration of the withdrawn medication to the patient on any hospital records. Respondent  
11 failed to account for 100mg Demerol in any hospital records.

12 (2) On or about February 19, 2005, at 0659 hours, Respondent signed out  
13 100mg Demerol without a physician order for this patient. Respondent failed to record  
14 administration of the withdrawn medication to the patient on any hospital records. Respondent  
15 failed to account for 100mg Demerol in any hospital records.

16 o. **Patient #87464095.**

17 (1) On or about March 4, 2005, at 1121 hours, Respondent signed out 100mg  
18 Demerol without a physician order for this patient. Respondent failed to record administration of  
19 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
20 for 100mg Demerol in any hospital records.

21 (2) On or about March 6, 2005, at 1621 hours, Respondent signed out 100mg  
22 Demerol without a physician order for this patient. Respondent failed to record administration of  
23 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
24 for 100mg Demerol in any hospital records.

25 (3) On or about March 6, 2005, at 1931 hours, Respondent signed out 100mg  
26 Demerol without a physician order for this patient. Respondent failed to record administration of  
27 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
28 for 100mg Demerol in any hospital records.

1 p. **Patient #90500844.**

2 (1) On or about February 15, 2005, at 1212 hours, Respondent signed out  
3 100mg Demerol without a physician order for this patient. Respondent failed to record  
4 administration of the withdrawn medication to the patient on any hospital records. Respondent  
5 failed to account for 100mg Demerol in any hospital records.

6 (2) On or about February 15, 2005, at 1402 hours, Respondent signed out  
7 100mg Demerol without a physician order for this patient. Respondent failed to record  
8 administration of the withdrawn medication to the patient on any hospital records. Respondent  
9 failed to account for 100mg Demerol in any hospital records.

10 q. **Patient #87439584.**

11 (1) On or about February 15, 2005, at 0718 hours, Respondent signed out  
12 100mg Demerol without a physician order for this patient. Respondent failed to record  
13 administration of the withdrawn medication to the patient on any hospital records. Respondent  
14 failed to account for 100mg Demerol in any hospital records.

15 (2) On or about February 15, 2005, at 1306 hours, Respondent signed out  
16 100mg Demerol without a physician order for this patient. Respondent failed to record  
17 administration of the withdrawn medication to the patient on any hospital records. Respondent  
18 failed to account for 100mg Demerol in any hospital records.

19 (3) On or about February 15, 2005, at 1523 hours, Respondent signed out  
20 100mg Demerol without a physician order for this patient. Respondent failed to record  
21 administration of the withdrawn medication to the patient on any hospital records. Respondent  
22 failed to account for 100mg Demerol in any hospital records.

23 r. **Patient #87475224.**

24 (1) On or about March 10, 2005, at 0743 hours, Respondent signed out 100mg  
25 Demerol without a physician order for this patient. Respondent failed to record administration of  
26 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
27 for 100mg Demerol in any hospital records.

28 (2) On or about March 10, 2005, at 0809 hours, Respondent signed out 100mg

1 Demerol without a physician order for this patient. Respondent failed to record administration of  
2 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
3 for 100mg Demerol in any hospital records.

4 (3) On or about March 10, 2005, at 1803 hours, Respondent signed out 100mg  
5 Demerol without a physician order for this patient. Respondent failed to record administration of  
6 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
7 for 100mg Demerol in any hospital records.

8 s. **Patient #87430237**. On or about February 19, 2005, at 0940 hours,  
9 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
10 failed to record administration of the withdrawn medication to the patient on any hospital  
11 records. Respondent failed to account for 100mg Demerol in any hospital records.

12 t. **Patient #87445086**. On or about February 24, 2005, at 0927 hours,  
13 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
14 failed to record administration of the withdrawn medication to the patient on any hospital  
15 records. Respondent failed to account for 100mg Demerol in any hospital records.

16 u. **Patient #41523655**. On or about February 15, 2005, at 1736 hours,  
17 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
18 failed to record administration of the withdrawn medication to the patient on any hospital  
19 records. Respondent failed to account for 100mg Demerol in any hospital records.

20 v. **Patient #21134622**. On or about February 19, 2005, at 0824 hours,  
21 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
22 failed to record administration of the withdrawn medication to the patient on any hospital  
23 records. Respondent failed to account for 100mg Demerol in any hospital records.

24 w. **Patient #21134523**. On or about February 24, 2005, at 0807 hours,  
25 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
26 failed to record administration of the withdrawn medication to the patient on any hospital  
27 records. Respondent failed to account for 100mg Demerol in any hospital records.

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1                   x.       **Patient #21136098.** On or about February 24, 2005, at 1348 hours,  
2 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent  
3 failed to record administration of the withdrawn medication to the patient on any hospital  
4 records. Respondent failed to account for 100mg Demerol in any hospital records.

5                   y.       **Patient #87463881.**

6                   (1)       On or about March 4, 2005, at 0909 hours, Respondent signed out 100mg  
7 Demerol without a physician order for this patient. Respondent failed to record administration of  
8 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
9 for 100mg Demerol in any hospital records.

10                  (2)       On or about March 5, 2005, at 0805 hours, Respondent signed out 100mg  
11 Demerol without a physician order for this patient. Respondent failed to record administration of  
12 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
13 for 100mg Demerol in any hospital records.

14                  (3)       On or about March 5, 2005, at 1045 hours, Respondent signed out 100mg  
15 Demerol without a physician order for this patient. Respondent failed to record administration of  
16 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
17 for 100mg Demerol in any hospital records.

18                  (4)       On or about March 5, 2005, at 1219 hours, Respondent signed out 100mg  
19 Demerol without a physician order for this patient. Respondent failed to record administration of  
20 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
21 for 100mg Demerol in any hospital records.

22                  (5)       On or about March 5, 2005, at 1844 hours, Respondent signed out 100mg  
23 Demerol without a physician order for this patient. Respondent failed to record administration of  
24 the withdrawn medication to the patient on any hospital records. Respondent failed to account  
25 for 100mg Demerol in any hospital records.

26                  z.       **Patient #87466843.** On or about March 5, 2005, at 1759 hours,  
27 Respondent signed out 100mg Demerol without a physician order for this patient. Respondent

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1 failed to record administration of the withdrawn medication to the patient on any hospital  
2 records. Respondent failed to account for 100mg Demerol in any hospital records.

3 **SEVENTH CAUSE FOR DISCIPLINE**

4 (False Records)

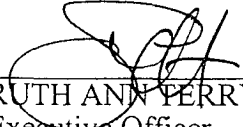
5 26. Respondent is subject to disciplinary action under Section 2761,  
6 subdivision (a), as defined in Section 2762, subdivision (e), on the grounds of unprofessional  
7 conduct, and violating Health and Safety Code sections 11173, subdivision (b), in that on or  
8 about four (4) days in February 2005, and four (4) days in March 2005, while on duty as a  
9 registered nurse at Northridge Hospital Medical Center, Northridge, California, Respondent  
10 made false, grossly incorrect, or grossly inconsistent entries in hospital records, failing to account  
11 for 4,200 mg of Demerol withdrawals, as set forth above in paragraph 25, above.

12 **PRAYER**

13 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
14 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 15 1. Revoking or suspending Registered Nurse License No. 539249, issued to  
16 Tereza Partow.
- 17 2. Ordering Tereza Partow to pay the Board of Registered Nursing the  
18 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
19 Professions Code section 125.3;
- 20 3. Taking such other and further action as deemed necessary and proper.

21  
22 DATED: 3/12/08

23  
24  fox:  
25 RUTH ANN PERRY, M.P.H., R.N.  
26 Executive Officer  
27 Board of Registered Nursing  
28 Department of Consumer Affairs  
State of California

Complainant